Voluntary and subpoena requests made to OneTaste

Since 2021 AUSAs from the Eastern District of New York have made 19 rounds of requests to OneTaste, totaling 199 individual questions, which OneTaste has responded to in 48 productions to date. There have been three subpoenas to OneTaste, issued on February 9, 2021, February 22, 2023 and August 28, 2023.

Note: The number to the left of the date in the 'Response' column corresponds with the number of the request in the 'Request' column.

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
Round - 01	SUPOENA //	1. Documents concerning the teachings and practices of the Company,	3 responses
	Feb 9, 2021	including the following:	
30 new		a. Complete Modules concerning Taboo, Magic School, The Mastery	1a – March 26, 2021
requests	<u>Time period: Jan</u>	Course, and Nicole Daedone Intensives (or NDI).	
	1, 2007 until	b. Materials, practices, and procedures issued by and/or in effect at the	1a – May 7, 2021
	<u>present</u>	Company that mention rape, sexual assault, and/or the victimhood of	
		women, including but not limited to Forums by any of the following	15 – May 28, 2021
		individuals: Nicole Daedone, Rachael Cherwitz,	
		,	
		c. Documents depicting current or former members, clients, volunteers,	
		affiliates or employees of the Company in which individuals' breasts	
		and/or public areas are exposed, and records sufficient to show of how	
		such materials were obtained and stored, and the source of such materials.	
		d. Documents depicting or discussing piercing, branding, surgical	
		procedures, and/or other forms of physical modification performed on	
		current or former members, clients, volunteers, affiliates, or employees	
		of the Company, and records sufficient to show how such materials	
		were obtained and stored, and the source of such materials.	
		e. Documents depicting rituals and ceremonies engaged in by current	
		or former members, clients, volunteers, affiliates, and/or employees of	
		the Company, including but not limited to documents depicting priests	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		and priestesses and documents referring to orgasm and/or Nicole	
		Daedone as a deity, and documents instructing individuals to engage in	
		sexual conduct as a service to the Company.	
		f. Documents containing references by Nicole Daedone and/or	
		to the assaults of one or more individuals.	
		g. Documents directing current or former members, clients, volunteers,	
		affiliates or employees of the Company to engage in sexual activity	
		and/or any other physical contact with one or more other individuals.	
		h. Documents referencing sexual activity among current or former members, clients, prospective clients, volunteers, affiliates or	
		employees of the Company, including documents containing references	
		to "Make Out," "Gender Balancing," "Sex Vacation," "Aversion	
		Therapy" and/or "Aversion Practice."	
		i. Documents containing references to the concept of consent as it	
		relates to sexual activity.	
		j. Documents referencing the arrangement of marriages among current	
		or former members, clients, prospective clients, volunteers, affiliates or	
		employees of the Company.	
		2.Documents concerning the Company's recruitment efforts, including	
		but not limited to the following:	
		a. Documents concerning the Company's effort to recruit new	
		members, clients, or other affiliates through rehabilitation programs;	
		homeless shelters and halfway houses; and adult dating applications	
		and websites.	
		b. Documents concerning agreements or arrangements written or	
		otherwise between the Company and other entities, to include but not limited to , relating to the	
		limited to, relating to the referral of potential clients, and records of any financial compensation	
		rendered pursuant to such agreements or arrangements.	
		rendered pursuant to such agreements of arrangements.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		3. Documents concerning any concerns, alerts and/or inquiries submitted or raised by current or former members, clients, volunteers, affiliates, and/or employees of the Company regarding the Company's practices and procedures, and the Company's response(s), if any, to such concerns, alerts and/or inquiries.	
		4. Documents concerning any concerns, alerts and/or inquiries submitted or raised by members of the public regarding the Company's practices and procedures, and the Company's response(s), if any, to such concerns, alerts and/or inquiries.	
		5. Documents concerning any analysis by forensic psychiatrists or psychologists of current or former members, clients, volunteers, affiliates, and/or employees of the Company concerning such persons' experiences at the Company and/or the Company's practices and procedures, including but not limited to communications and invoices relating to such analysis.	
		6. Documents concerning any communications by current or former members, clients, volunteers, affiliates, and/or employees of the Company with law enforcement agents and investigators.	
		7. Documents concerning the Company's ethical review of its practices and procedures, including but not limited to documents relating to "Ethical Breaches" and an "Ethical Review," and an "Ethics Committee," and documents sufficient to identify the members and positions of individuals on or affiliated with the "Ethics Committee."	
		8. Documents concerning the Company's efforts to obtain green cards, visas, or other immigration benefits for current or former members, clients, volunteers, affiliates, and/or employees of the Company.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		9. Documents sufficient to identify the addresses of any commercial	
		and residential locations affiliated with the Company, including any rental agreements for such locations, any codes of conduct in effect at	
		such locations, and records of payment by tenants of such locations.	
		such focutions, and feeded of payment by tenants of such focutions.	
		10. Documents concerning the Company's compensation practices,	
		including but not limited to the following: a. Documents sufficient to identify the amount of commissions and/or	
		wages earned by the Company's employees, volunteers, and/or	
		independent contractors affiliated with the Company.	
		b. Documents sufficient to identify the payment schedule of	
		commissions and/or wages earned by the Company's employees and/or	
		independent contractors affiliated with the Company. c. Document concerning any withholding or delay of compensation to	
		the Company's employees, volunteers, and/or independent contractors	
		affiliated with the Company.	
		d. Documents concerning loans issued by the Company to the	
		Company's employees, volunteers, and/or independent contractors affiliated with the Company.	
		11. Documents concerning payments of any kind (including but not	
		limited to loan and royalty payments) made to or from Nicole Daedone	
		and, including any relevant agreements concerning such payments.	
		12. Documents concerning any and all 501(c)3 or other charitable	
		entities established on behest of Nicole Daedone, Rachael Cherwitz,	
		, to include	
		but not limited to Fill up America, OM Free and The One Taste	
		Foundation.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		13. Documents concerning any offers, contracts, agreements, or arrangements relating to the sale of the Company and/or any of its	
		affiliates, including but not limited to related records of payment.	
		14. Documents concerning the Company's document retention policies and procedures.	
		15. Organizational charts for the Company including, but not limited to:	
		a. Documents sufficient to identify all current and former employees of OneTaste.	
		b. Documents sufficient to identify the senior management and executive officers of the Company, including reporting chains for all	
		business lines, sales, marketing and compliance functions from January 1, 2007 to the present.	
		c. Documents sufficient to identify the role(s) and title(s) of Nicole Daedone and in the Company.	
Round - 02	VOLUNTARY REQUEST //	1. OneTaste's capitalization table, or, if OneTaste does not have one, a full list of all OneTaste investors and fully-executed agreements setting	4 responses
8 new requests	May 23, 2022	out the terms of their investments.	3, 4, 5, 7 – June 6, 2022
1	<u>Time Period:</u>	2. All bookkeeping and accounting records prepared or maintained for	
	Jan 1, 2015 to present	OneTaste. For each tax year produce financial statements; chart of accounts, general ledger, journal; subsidiary ledgers, trial balance;	1 – Aug 25, 2022
		balance sheet; statement of profit & loss and vendor reports.	4 – Aug 25, 2022
		3. All records or other documents relative to the above whether or not used in the preparation of a tax return including Vendor Invoices;	5 – Aug 25, 2022
		Forms 1099; Forms 1098; Trust Agreements; Consulting Agreements; Commission Agreements; Insurance Policies; Loan Agreements and	
		Promissory Notes.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
REQUEST#	TYPE // DATE	 4. Copies of OneTaste's federal and state income tax and employment tax returns including amended tax returns whether filed or unfiled. 5. For S-corporations, schedules identifying shareholder's basis in stock and debt at the beginning and end of each tax period including information which identifies any adjustments to shareholder basis. 6. For Partnerships, schedules identifying beginning and ending balances in partner capital account for each tax period including information which identifies any adjustments to capital account balances. Include information which identifies and partnership non-recourse debt. 7. For each tax return prepared and electronically filed, signed copies of: Form 8879-PE IRS e-file Signature Authorization for Form 1065; Form 8879-S IRS e-file Signature Authorization for Form 1120; Form 8879-F IRS e-file Signature Authorization for Form 1120; Form 8879-F IRS e-file Signature Authorization for Form 1041. 8. Copies of Form TD F 90-22.1 or FinCEN Form 114, Report of Foreign Bank and Financial Accounts prepared or filed on behalf of OneTaste. 	RESPONSE
Round - 03 56 new requests	VOLUNTARY REQUEST // June 15, 2022	1. Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (Subpoena Request # 10): i. Nicole Daedone ii.	5 responses 2 – June 28, 2022 3 – June 30, 2022

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		iii. Rachael Cherwitz	1 – July 13, 2022
		iv.	
		V.	4 – July 19, 2022
		vi.	
		vii.	6 – July 22, 2022
		viii.	
		ix.	
		X.	
		xi.	
		xii.	
		xiii.	
		xiv.	
		XV.	
		xvi.	
		2. Rental and lease agreements associated with all prior and current	
		OneTaste locations (Subpoena Request # 9)	
		One raste locations (Subpoena Request # 7)	
		3. Documents sufficient to identify the ownership, investors and legal	
		representation (if any) of OneTaste entities other than OneTaste	
		Incorporated, including but not limited to	
		i. The Land	
		ii. One Taste Holdings LLC	
		iii. One Taste Investments LLC	
		iv. OneTaste New York	
		v. OneTaste Washington D.C.	
		vi. OneTaste Boston	
		vii. OneTaste Colorado	
		viii. OneTaste Austin	
		ix. OneTaste Bay Area	
		x. OneTaste Media LLC	
		xi. Mirror Clan Inc.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		xii. Caravan Retreats	
		xiii. Do the Right Thing	
		xiv. Om Free	
		xv. The OneTaste Foundation	
		xvi. Fill Up America	
		4. Executed agreements concerning the sale (including the sale of shares of common stock) of OneTaste and any of its affiliates	
		(Subpoena Request # 13)	
		5. Documents concerning any payments made to Nicole Daedone (Subpoena Request # 11)	
		6. Sales Team records and communications, including relevant slack communications/text messages (Subpoena Requests # 2 and # 3)	
Round - 04	VOLUNTARY REQUEST //	1. All bookkeeping and accounting records prepared or maintained for OneTaste. For each tax year produce financial statements; chart of	6 responses
47 new requests	July 28, 2022	accounts, general ledger, journal; subsidiary ledgers, trial balance; balance sheet; statement of profit & loss and vendor reports.	1 – Aug 24, 2022
requests		(Requested by email 5/24/2022)	2 – Aug 25, 2022
		2. Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste	3 – Aug 25, 2022
		entities and affiliates, and the contents of personnel files for the following individuals (Subpoena Request # 10) (Requested by email	5 – Aug 30, 2022
		June 15, 2022): i.	4 – Sept 19, 2022
		ii.	6 – Oct 2, 2022
		iii. iv.	
		V.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		vi. vii. viii. ix.	
		3. In addition, can you please confirm that you do not have any additional documents for Nicole Daedone, Rachel Cherwitz,	
		responsive to this request? I noticed there are very few records, and no records of payments made to/from these individuals.	
		4. Sales Team records in addition to the slack communications provided (Subpoena Requests # 2 and # 3) (Requested by email June 15, 2022)	
		In addition, can you please provide the following additional materials:	
		5. Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for the following individuals (happy to provide dates of birth if helpful):	
		i. ii. iii.	
		iv. v. vi.	
		vii. viii.	
		ix.	
		xi.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		xii.	
		xiii.	
		xiv.	
		XV.	
		xvi.	
		xvii.	
		xviii.	
		xix.	
		XX.	
		xxi.	
		xxii.	
		xxiii.	
		xxiv.	
		XXV.	
		xxvi.	
		xxvii.	
		xxviii.	
		xxix.	
		XXX.	
		xxxi.	
		xxxii.	
		xxxiii.	
		xxxiv.	
		xxxv.	
		xxxvi.	
		xxxvii.	
		xxviii.	
		xxxix.	
		xl.	
		6. Records, course materials, and attendee or student lists for the	
		following courses:	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		 i. Nicole Daedone Intensive (Fall 2014) ii. Mastery Courses (2014) iii. Mastery Courses NYC (2013 – 2016) iv. Mastery Course LA (June 2015) v. Magic School (Spring 2015) vi. Magic School (August 2014) vii. Taboo (October 2015) 	
Round - 05	VOLUNTARY REQUEST //	In addition, please provide us with the following:	2 responses
2 new requests	Sept 21, 2022	1. Agreements associated with March 2017 sale of OneTaste and any payments made to Nicole Daedone in connection with (both before and	2 – Oct 24, 2022
1		after) her departure from the company in 2017 (including any sale of OneTaste equity).	1 – Oct 26, 2022
		2. We would also like any communications or documents you have concerning Nicole Daedone's departure from OneTaste.	
Round - 06	VOLUNTARY REQUEST //	1. We have one follow-up request: can you please provide documents that relate to OneTaste individualized events and services referred to as	1 response
1 new request	Oct 31, 2022	"immersions," "1080 immersions," "scenes," or "experiences"? In particular, we would like to obtain related client lists, intake forms, interview notes, video/audio recordings, scripts, list of participants, and communications (by text, email, slack, or any other service) relating to these individualized experiences. Happy to discuss this in more detail if you have any question.	1 – Nov 21, 2022
Round - 07	VOLUNTARY REQUEST //	1. We also request that you provide us with any documents or communications that OneTaste has provided to the BBC or any other	1 response
1 new request	Nov 8, 2022	individual or party (including former OneTaste members) in connection with the ongoing defamation lawsuit against the BBC, or	1 – Dec 1, 2022

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		any defamation lawsuits contemplated against other news organizations.	
Round - 08	VOLUNTARY REQUEST //	As I mentioned yesterday, we are requesting the production of the following materials:	10 responses
26 new	Dec 14, 2022		2 – Dec 20, 2022
requests		1. The full recordings of interviews of all individuals who have been interviewed in connection with this investigation.	1 – Jan3, 2023
		2. Copies of the full threads of all of the communications referenced during yesterday's presentation.	3 – Jan 11, 2023
			5 – Jan 18, 2023
		3. All documents regarding OneTaste's course refund policies, and documents sufficient to show any refunds requested and whether they	5 – Jan 24, 2023
		were granted or denied, and the basis for the grant/denial.	4 1 20 2022
		4. Time logs for all OneTaste employees.	4 – Jan 30, 2023
		4. Time logs for all Offeraste employees.	6 – Feb 3, 2023
		5. All rental agreements for OM communal living and commercial	,
		spaces, and documents regarding OneTaste's collection of rent paid by its members.	10 – Feb 6, 2023
			11 – Feb 9, 2023
		6. Documents sufficient to show OneTaste's full course offerings	0 0 000
		7. All text and email communications regarding OneTaste by the following individuals:	9 – Sept 29, 2023
		a. Nicole Daedone	
		b.	
		c. Rachael Cherwitz	
		d. e. e.	
		f.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		g.	
		h.	
		1	
		k.	
		1.	
		m.	
		n. o.	
		p.	
		8. All communications (including but not limited to text/email/slack)	
		by any OneTaste member regarding and/or	
		9. All communications (including but not limited to text/email/slack)	
		by any OneTaste member regarding allegations of sexual misconduct	
		or abuse in connection with their participation in OneTaste.	
		10. A list of OneTaste's outside experts hired and the amounts each expert was paid.	
		11. All documents regarding OneTaste's reconciliation team	
		Hopefully items (1) and (2) should be quick to put together, because it	
		appears that they were used to prepare your presentation yesterday.	
		Beyond those items, one of the top priorities is the production of communications by members of OneTaste's leadership. We have never	
		received any communications by Nicole Daedone or Rachel Cherwitz	
		(except for a very limited collection of text threads), including the	
		communications they exchanged with each other.	
	<u> </u>		

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
Round - 09	VOLUNTARY	1. Can we please have copies of all text/chat messages that	
	REQUEST //		
2 new	Dec 20, 2022	exchanged with?	
requests		2. In addition, can you please provide us with records of all payments	
		made to OneTaste and its leaders and affiliates by	
		?	
Round - 10	VOLUNTARY REQUEST //	1 - Thank you for sending the recorded interviews. We noticed the interview for appears to be "Part 2" of a multi-part series,	1 response
2 new	Jan 6, 2023	and we believe that during our meeting we were shown excerpts of the	2 – Jan 18, 2023 EM
requests	, , ,	first part. Can you please send us the first recording?	
		2- In addition, would you be willing to share with us the names of the 30-40 individuals who were interviewed?	
		50-40 marviduais wito were interviewed:	
Round - 11	VOLUNTARY	1 - Regarding the rent payments – could you please produce any	1 response
	REQUEST //	records of rent payments made to a company doing business as	
1 new	Jan 19, 2023	Caravan Retreats or confirm that none exist?	1 – Jan 24, 2023
request Round - 12	VOLUNTARY	1. In addition, please produce the following: All "fear inventories" or	
Rouna 12	REQUEST //	related intake documents for any OneTaste members or employee	
1 new	Jan 26, 2023		
request			
Round - 13	VOLUNTARY	1. Are you available for a call sometime next week (beginning on	
1 new	REQUEST // Feb 10,	Wednesday, Feb 15) to discuss the video-recorded interviews? <u>In</u> addition, in advance of the call, can you please confirm who conducted	
request	100 10,	the interviews, who was present for the interviews, and when the	
1-4000		interviews occurred? (Emphasis added)	
Round - 14	SUBPOENA //	1. Records of payments made by OneTaste by all investors, lenders,	10 responses
	Feb 22, 2023	partners, acquirers, and owners of any branch of OneTaste, including	
			5 – March 28, 2023

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
4 new	<u>Time Period:</u>	but not limited to payments by , and , and	
requests	<u>Jan 1, 2007 to</u>	r.	1 – April 3, 2023
	<u>present</u>		
		2. All communications, including but not limited to email, text and	8 – March 29, 2023
		Slack communications, regarding OneTaste by the following	7 4 1110 2022
		individuals: 1. Nicole Daedone	7 – April 19, 2023
		2.	7 – April 26, 2023
		3. Rachael Cherwitz	7 – April 20, 2023
		4.	10 – QUASHED
		5.	JUDGE PAMELA
		6.	K. CHEN
		7.	
		8.	9 – Aug 28, 2023
		9.	7 9
		10	7 – Sept 14, 2023
		12.	7 – Sept 22, 2023
		13.	7 Sept 22, 2023
		14.	4 – Sept 29, 2023
		15.	
		16.	3 – Oct 21, 2023
		3. All communications by any OneTaste member regarding	
		and/or and/or	
		4. All communications by any OneTaste member regarding allegations	
		of sexual misconduct or abuse in connection with their participation in	
		One Taste.	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		5. Copies of all communications that exchanged with	
		6. A list of all current OneTaste employees, their titles, and their dates of employment.	
		7. All documents regarding OneTaste's course refund policies, and documents sufficient to show any refunds requested and whether they were granted or denied, and the basis for the grant/denial.	
		8. All "Fear Inventories" in your possession, custody or control.	
		9. All spreadsheets, customer lists, records or training materials used and maintained by OneTaste's sales team.	
		10. Any and all audio or video recordings, or other mechanical recordings in your possession, custody or control which record or reflect statements made by any of the following individuals: [list of 64 video interviewees OneTaste previously supplied]	
Round - 15	VOLUNTARY REQUEST //	1. It would be helpful if you could specify which of the individuals in request #10 are current or former employees (and separate between the	1 response
1 new request	March 6, 2023	two categories).	March 8, 2023 EM
Round - 16	VOLUNTARY REQUEST // March 8, 2023	1. Can you please identify which of these are actual employees (current and former)?	
request	17turen 0, 2023	2. And can you please let us know the actual employment status of those you flag as the functional equivalent of employees?	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
	March 9, 2023	We want to know which individuals had employment contracts with the company. And if any of those contracts provided for a contractor	1 response
		status, please identify those individuals accordingly.	March 10, 2023 EM
Round - 17	VOLUNTARY REQUEST //	Can you please confirm whether you have responded to Item #6 of the February 21, 2023 subpoena (which requests a list of all current	1 response
1 new request	April 12, 2023	OneTaste employees, their titles, and their dates of employment)? I do not believe we have received a response on that yet, unless I am mistaken. In addition, as I believe we discussed on a prior call, can you please produce to us all agreements with all current and former OneTaste employees, contractors and/or volunteers concerning the terms of their responsibilities and compensation? We are happy to make the request by subpoena if needed. [emphasis added]	May 4, 2023
Round - 18 1 new request	VOLUNTARY REQUEST // May 2, 2023	Can you please send us a list of all attorneys and law firms who have represented OneTaste (presently or previously), and their contact information?	1 response May 3, 2023 EM
Round - 19 13 new requests	SUBPOENA // Aug 28, 2023 Time Period:	1. All communications, including but not limited to email, text and Slack communications, sent to or received by Nicole Daedone and/or Rachel Cherwitz regarding the following:	
	Jan 1, 2008 to Jan 1, 2019	 a. Romantic or sexual relationships among OneTaste clients, contractors and employees; b. Instructions to engage in sexual acts; c. Any previous or contemporaneous trauma experienced by clients, volunteers, contractors and employees; d. Employee or contractor reassignments to different OneTaste locations; e. Payments to OneTaste employees or contractors; f. 	

REQUEST #	TYPE // DATE	REQUEST	RESPONSE
		g. Individuals identified as "VIPs," including by not limited to potential	
		or current OneTaste benefactors, investors and clients;	
		h. Allegations involving incidents of alleged sexual or physical abuse	
		or misconduct;	
		i. Rachel Cherwitz's departure from OneTaste.	
		2. All documents and communications, including but not limited to	
		email, text and Slack communications, by any OneTaste member	
		regarding demand letter to OneTaste, the	
		subsequent mediation between OneTaste and in	
		December 2015, and OneTaste's settlement agreement with	
		3. All documents regarding Nicole Daedone Intensive courses held in 2018.	
		4. Documents sufficient to identify all corporate entities, trusts, non-profit organizations, and businesses affiliated with OneTaste.	
		5. Documents sufficient to identify the host of the @onetaste.us email domain and where emails sent or received using the @onetaste.us email domain are stored.	
	Nov 17, 2023	I wanted to follow up regarding our prior conversation about Request 1	
		of the attached subpoena. Of Request 1, we would still request that	
		you provide items 1(e), 1(g) and 1(i). Can you please confirm whether	
		you intend to comply with those requests?	